

Thank you for allowing me to comment on RM-10867. This proposal has the makings of a great compromise. There is something in this for everyone to dislike which is the sign of any compromise. Those that want to remove all element 1 testing are upset that the proposal requests keeping a code proficiency test for the extra class license. The pro code crowd are upset that only code testing for the extra class is being proposed. I would like to see code testing required for some class of amateur license be it the general or extra class license. The number of amateur radio license classes is also up for debate. I don't see great need to eliminate grandfathered licenses immediately. The data is already in the FCC database and requires very little attention to keep it there. In WT 98-143 the commission stated that they thought that three classes of licenses were the appropriate number. The ARRL proposal seeks to add a new Beginner class of license and still maintain the 3 class structure. The reasoning behind the new Beginner's license is to increase the number of young people in the amateur ranks. I don't think that amateur radio can compete for the attention of our young people no matter how easy we make the entry point. Their time is occupied elsewhere with school and other activities. The number of amateur operators did not increase very much after the last restructuring and I don't think that these changes will do much to increase our ranks this time around. Just as we must not take too many privileges away with any restructuring, we must not grant too many new privileges without appropriate testing. I would hope that the 3 tier system would not be cast in stone and if it were deemed necessary to add a new class of license that class could be added without too much difficulty. In the case of the ARRL proposal, the upgrading of Technician and Technician with Morse code to general without testing seems ill advised. I am not sure that the amateur service can survive allowing 300,000 plus untested and possibly poorly prepared operators sudden access to the already crowded HF amateur bands. I feel that a better structure would be to have the Beginner class as proposed by the ARRL but with smaller band segments than proposed. The Beginner class should also be time limited to 2 years and not be renewable. Keep the Technician class but grant them the new Beginner class HF privileges. Keep the General class but eliminate element 1 testing. Make the Advanced class non renewable. There was a window of opportunity for the Advanced operators to upgrade by taking the old element 4B test as part of the last reorganization. Advanced operators should now have the choice of upgrading to Extra or being renewed as Generals. Keep the Extra class the same with element 1 testing. If it truly is the commission's intent to keep three classes of amateur licensees, then the Beginner class license would be the renewable entry point into amateur radio. The Technician license would become non renewable with the choice of upgrading to General or being renewed at the lower level. Also, there must be enough separation in privileges to allow a true incentive to upgrade. Granting too many privileges to the lower classes of licenses dissuades amateurs from becoming more knowledgeable and moving up in operator class.

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